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March 18, 2025

Hon. Harvey Bartle III, U.S.D.J.
United States District Court for the
Eastern District of Pennsylvania
16614 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

**Re: *Atlas Data Privacy Corporation, et al. v. RocketReach LLC, et al.*
Civil Action No. 1:24-cv-4664 (HB)**

Dear Judge Bartle:

This firm represents defendant RocketReach LLC ("RocketReach") in the above-referenced matter.

We write to advise the Court that RocketReach joins the Consolidated Motion to Dismiss Pursuant to Rule 12(b)(6), which was filed on Tuesday, March 18, 2025 in the action captioned as *Atlas Data Privacy Corporation, et al v. DM Group, Inc. et al*, Civil Action No. No. 1:24-cv-04075 (HB) (the "Consolidated Motion to Dismiss"). See Dkt. No. 059. For the reasons set forth in the Consolidated Motion to Dismiss, RocketReach respectfully requests that the Court dismiss Plaintiffs' Complaint against RocketReach with prejudice.

Respectfully submitted,

/s/ Angelo A. Stio III

Angelo A. Stio